

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                            )  
                            v.                      )         Criminal No. 02-30043-MAP  
                            )  
(1) ALEKSEI SAFANOV,      )  
(2) IVAN TELEGUZ,          )  
(3) ROMAN ZHIRNOV,        )  
(4) ANDREY BUYNOVSKIY,    )  
(5) MICHAEL QUICKEL,      )  
                            Defendants.      )

Government's Motion to Extend for Six Days Its Time to Respond to Defendants' Pretrial Motions

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court extend the government's time to respond to the defendants' pretrial motions for six days, until December 23, 2004.

In support of this motion, the government states that the defendants' motions have been filed at various times and as recently as December 10, 2004. The government was unable to prepare its response to the motions by the date previously established by the Court, December 17, 2004. Delaying the government's response by six days will not effect oral argument on the motions, which is scheduled for December 29, 2004.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

by: /s/ Kevin O'Regan  
Kevin O'Regan  
Assistant U.S. Attorney

Date: December 19, 2004

Certificate of Service

December 19, 2004

I certify that I on December 20, 2004, I will cause the foregoing document to be mailed to counsel for the defendants.

/s/ Kevin O'Regan  
Kevin O'Regan  
Assistant United States Attorney